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Attorneys for Defendant State of Oregon

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ANGELICA MATHENEY, individually and
as Personal Representative of the ESTATE OF
ISAAC MATHENEY; G.M., a minor by and
through her guardian ad litem Angelica
Matheny, individually; A.M., a minor by and
through his guardian ad litem Angelica
Matheny; M.M., a minor by and through his
guardian ad litem Angelica Matheny,
individually; VICTORIA TAYLOR-
MATHENEY, individually; KIASIA
BAGGENSTOS, individually; BEUSE
MATHENEY, individually; and LINDA
DOMINGUEZ, individually,

Plaintiffs,

v.

STATE OF OREGON; LAKE COUNTY; and
DOES 1-10, inclusive,

Defendants.

Case No. 1:22-cv-01931-AA

DECLARATION OF KATIE SUVER IN
SUPPORT OF UNOPPOSED MOTION FOR
EXTENSION OF DISCOVERY DEADLINES

I, Katie A. Suver, hereby declare:

1. I am an attorney licensed to practice law in the State of Oregon and admitted to practice before the United States District Court for the District of Oregon. I am employed as an Assistant Attorney General with the Oregon Department of Justice. I am currently assigned to represent Defendant State of Oregon in the above-captioned case.

2. I make this declaration in support of Defendant State of Oregon's Unopposed Motion for Extension of Time and under penalty of perjury. I have personal knowledge of and am competent to testify to the facts herein.

3. The current deadline to complete discovery is April 13, 2023; and the deadline to file a Joint ADR Report and Pretrial Order is May 13, 2023.

4. I have conferred with Plaintiffs' counsel and with counsel for Lake County on this extension of time request. The parties are in agreement with the proposed extension.

5. Defendant State of Oregon respectfully requests that the deadline to complete discovery be extended to October 13, 2023, the deadline to file dispositive motions be extended to November 30, 2023, and the deadline to submit a Joint ADR Report and Pretrial Order be set for 30 days from the date any dispositive motions are decided.

6. This request is made in good faith and not for the purposes of unnecessary delay.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on March 3, 2023.

s/ Katie Suver
KATIE SUVER
Assistant Attorney General

CERTIFICATE OF SERVICE

I certify that on March 3, 2023, I served the foregoing DECLARATION OF KATIE SUVER IN SUPPORT OF UNOPPOSED MOTION FOR EXTENSION OF DISCOVERY DEADLINES upon the parties hereto by the method indicated below, and addressed to the following:

John M Coletti
Paulson Coletti Trial Attorneys PC
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Of Attorneys for Plaintiffs

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s/ Katie Suver
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